

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

QUALCOMM INCORPORATED,)	
a Delaware corporation; and)	
QUALCOMM TECHNOLOGIES, INC.,)	
a Delaware corporation,)	
)	C.A. No. 24-490 (MN)
Plaintiffs,)	
)	
v.)	
)	
ARM HOLDINGS PLC., f/k/a ARM LTD.,)	
a U.K. corporation,)	REDACTED PUBLIC VERSION
)	
Defendant.)	

**PLAINTIFFS' CONCISE STATEMENT OF FACTS IN SUPPORT
OF THEIR OPPOSITION TO ARM'S MOTION FOR
SUMMARY JUDGMENT THAT ARM DID NOT BREACH SECTIONS [REDACTED] AND
[REDACTED] OF THE TLA (COUNTS VII-VIII)**

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I. THE QUALCOMM TLA

1. [REDACTED] D.I. 435 Ex. 1 [REDACTED]

2. [REDACTED]

[REDACTED]

...

[REDACTED]

Id. § [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

Id. § [REDACTED]

[REDACTED] APPLIES TO QUALCOMM'S [REDACTED]

4. On March 23, 2012, Qualcomm circulated an early draft of [REDACTED] that stated:

[REDACTED]

Ex. 48 at -231.

5. [REDACTED]

[REDACTED] *Id.* at -230.

6. [REDACTED]

[REDACTED] re.” *Id.*

7. [REDACTED]

[REDACTED] .” *Id.*

8. [REDACTED]

[REDACTED] . Ex. 49 at -068.

9. [REDACTED]

[REDACTED]. *Id.*

10. [REDACTED]

[REDACTED]. *Compare id.*, with D.I. 435 Ex. 1 § [REDACTED]

11. Laura Sand, who was personally involved in negotiating the [REDACTED]

[REDACTED] of the TLA on behalf of Qualcomm, testified that [REDACTED]

[REDACTED] Ex. 50 at

89:11-17; 97:6-17 (Sand); Ex. 1 at 11:8-20, 26:8-20 (Sand).

12. Jonathan Weiser, who was personally involved in negotiating the TLA, likewise

testified that [REDACTED]

[REDACTED] Ex. 93 at 52:12-15, 186:25-190:3 (Weiser).

13. Arm witnesses understand [REDACTED] to apply to all requests by Qualcomm to

license an [REDACTED]. Ex. 51 at 65:1-20, 72:3-7, 74:19-75:11 (Abbey); Ex. 52 at 17:7-11, 148:16-149:23 (Couillard).

14. Arm claims that it complied with [REDACTED] in connection with Qualcomm's

[REDACTED] [REDACTED]. Ex. 53 at 61:17-62:8 (Youssef); Ex. 54 at 60:15-61:5 (Shivashankar); Ex. 55 at 60-62.

15. Arm has never licensed a core to Qualcomm for a term of [REDACTED]-months or less. D.I.

435 Ex. 2 [REDACTED] Ex. 26 [REDACTED] Ex. 27 [REDACTED]); Ex. 34 [REDACTED]

[REDACTED]; Ex. 35 [REDACTED]

16. Arm [REDACTED]

[REDACTED] [REDACTED] Ex. 57.

III. Arm Breached Section [REDACTED] By [REDACTED]

17. When [REDACTED]

[REDACTED] D.I.

435 Ex. 2 [REDACTED] Ex. 58 at -706; Ex. 59 at -888.

18. On [REDACTED]

[REDACTED]

[REDACTED] Ex. 60.

19. Arm did not [REDACTED]

[REDACTED]

[REDACTED] Ex. 64 at -547; EX. 65; Ex. 53

at 100:3-102:2 (Youssef).

20. After Qualcomm moved to amend its complaint to allege that Arm breached

[REDACTED] by [REDACTED] (D.I. 90), Jeff Fonseca told Kurt Wolf [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED].

D.I. 435 Ex. 17 at -856; Ex. 61 at -726.

21. [REDACTED]

[REDACTED]

[REDACTED]

22. Arm never provided Qualcomm [REDACTED]

[REDACTED] D.I. 442 Ex. 38 at 62-63.

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CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on November 7, 2025, upon the following in the manner indicated:

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